## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

NASIM GHEBARI,

Plaintiff,

Case No. 1:19-cv-01218

v.

NATIONAL GAS AND ELECTRIC, LLC, and

JOHN DOES 1-10,

Defendant.

Honorable Judge Robert M. Dow, Jr.

### **JOINT STATUS REPORT**

Pursuant to this Honorable Court's Case Management Procedures and Honorable Judge Dow's June 12, 2019 minute entry, the Parties submit the following Joint Status Report.

#### I. Attorneys of Record

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## II. Meet and Confer

Counsel for Plaintiff and Defendant have agreed to limited discovery requests. On May 20, 2019, Plaintiff's counsel sent Defendant's counsel an e-mail containing five proposed discovery requests and Defendant has no objection to answering those discovery requests. Defendant has agreed to respond with answers to the questions presented in Plaintiff's counsel's June 18, 2019 e-mail on or before July 5, 2019.

# III. Fed. R. Civ. P. 56(d) Affidavit Schedule

- A. Plaintiff requests 21 days from July 5, 2019, up to and including July 26, 2019, to respond to Defendant's Motion for Summary Judgment [Doc # 27] with Plaintiff's FRCP 56(d) Affidavit.
- B. Defendant requests 14 days from July 26, 2019, up to and including August 9, 2019, to file a response to Plaintiff's FRCP 56(d) Affidavit.

Dated: June 28, 2019

#### **Nasim Ghebari**

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### **National Gas And Electric, LLC**

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